



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
NEW YORK REGIONAL OFFICE  
BROOKFIELD PLACE  
200 VESEY STREET, ROOM 400  
NEW YORK, NY 10281-1022

October 24, 2019

By Hand and ECF

Hon. P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: SEC v. Telegram Group Inc. & TON Foundation Inc., No. 19 Civ. 9439 (PKC)

Dear Judge Castel:

Plaintiff Securities and Exchange Commission (“SEC”) respectfully submits this letter enclosing a binder containing the Exhibits to the Declaration of Kevin P. McGrath, dated October 23, 2019, that was submitted in support of the SEC’s Motion to File Certain Documents Under Seal and in Redacted Form on ECF, Dkt. No. 28. The SEC’s Motion seeks, in part, the Court’s permission to submit these exhibits *in camera* pending the Court’s resolution of the SEC’s Motion to Seal.

Courtesy copies of the SEC’s Notice of Motion; Memorandum of Law in Support of its Motion to Seal Certain Documents; the McGrath Declaration and the proposed Order Granting Application to File under Seal are also enclosed with the binder.

Copies of the binder and this letter are also being hand-delivered to Defendants’ counsel on this date.

Respectfully submitted,

/s/ Kevin P. McGrath  
Kevin P. McGrath

cc. Alexander Drylewski, Esq.  
Counsel for Defendants